

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,)
)
 Plaintiff,)
)
 v.) Misc. No. 17-151-LPS
)
BOLIVARIAN REPUBLIC OF)
VENEZUELA,)
)
 Defendant.)

**NOTICE OF FILING OF
STALKING HORSE BID MATERIALS RECEIVED BY SPECIAL MASTER**

PLEASE TAKE NOTICE THAT, pursuant to the *Memorandum Order Regarding Sale Process and Litigation* dated December 31, 2024 (D.I. 1517) (the “**December 2024 Order**”), the Special Master hereby files the stalking horse bid materials submitted by the three (3) bidders not recommended as the stalking horse by the Special Master (the “**Other Bid Materials**”).¹ See D.I. 1517 ¶ 23. The Special Master separately filed the bid letter submitted by the recommended stalking horse as an exhibit to the *Notice of Special Master’s Recommendation of Stalking Horse* (D.I. 1596). The Other Bid Materials attached hereto contain minimal redactions intended to preserve the confidentiality of the bidder’s identity and any other sensitive information. See *id.* The Other Bid Materials submitted by: (i) bidder A are attached hereto as **Exhibit A**; (ii) bidder B are attached hereto as **Exhibit B**; and (iii) bidder C are attached hereto as **Exhibit C**.

¹ The Other Bid Materials attached hereto do not include the financing commitment letters submitted by the applicable bidders, if any.

Respectfully submitted,

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Dated: March 21, 2025
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